

Elizabeth F. Rojas, Chapter 13 Trustee  
15260 Ventura Blvd., Suite 710  
Sherman Oaks, CA 91403  
Telephone: (818) 933-5700  
Facsimile: (818) 933-5755

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA, SAN FERNANDO VALLEY DIVISION

In re: ) Case No. 1:22-bk-10300-MB  
Lloyd Douglas Dix )  
Debtor(s). ) Chapter 13  
 ) STIPULATION TO RESOLVE TRUSTEE'S  
 ) OBJECTION TO HOMESTEAD  
 ) EXEMPTION UNDER C.C.P. §704.730  
 ) (docket 41).  
 ) [NO HEARING REQUIRED]  
 )  
 )

**THE UNDERSIGNED HEREBY STIPULATE AND AGREE AS FOLLOWS:**

19 On June 30, 2022, the Chapter 13 Trustee filed an Objection to Homestead Exemption.  
20 At issue is the “countywide median sale price for a single-family home in the calendar year prior  
21 to the calendar year in which the judgment debtor claims the exemption ...” 11 U.S.C §704.730.

22 The code fails to provide the authority the parties should look to in order to determine the  
23 median value as indicated in the code. A review of available resources, including the State of  
24 California Department of Industrial Relations of the Consumer Price Index for All Urban  
25 Consumers, indicate the median price is well above the current cap of \$626,400. The cost of

1 litigating this issue is prohibitive. Therefore, there appears to be no harm to the estate to  
2 compromise this matter by extending the Exemption Deadline through the date Debtor received  
3 Debtor's discharge or completion of the Chapter 13 case.

4 WHEREFORE, Debtor and Trustee stipulate that the Exemption Deadline found at FRBP  
5 4003(b) shall be extended through the date upon which the Debtor receives Debtor's discharge or  
6 completion of the Chapter 13 case.

7 Date: **SEP 12 2022**

8  
9 Date: **9-8-22**

*Elizabeth F. Rojas*  
NOT VALID FOR BANKING TRANSACTION

ELIZABETH F. ROJAS,  
Chapter 13 Trustee

*David S. Hagen*

DAVID S. HAGEN  
Attorney for Debtor

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25